

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
MARTIN AND NICOLE CASEY : CHAPTER 13  
Debtors. :  
\*\*\*\*\*  
LAKEVIEW LOAN SERVICING LLC :  
: :  
Movant, :  
: :  
vs. :  
MARTIN AND NICOLE CASEY : CASE NO. 5-17-02942  
Respondents. :  
\*\*\*\*\*

**DEBTORS' ANSWER TO MOTION FOR RELIEF FROM**  
**AUTOMATIC STAY UNDER SECTION 362**

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AND NOW COMES, Martin and Nicole Casey, the Debtors, and files an Answer to Lakeview  
Loan Servicing's Motion for Relief From the Automatic Stay:

1. Martin and Nicole Casey (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtors have failed to make post-petition mortgage payments.
3. Debtors Counsel is in the process of contacting the debtors to ascertain if the payments have been made and/or if the Debtors are in possession of the funds needed to cure the arrears.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtors respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: May 31, 2018

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID# 59887  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504  
(570) 347-7764

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on May 31, 2018, he caused a true and correct copy of  
Debtor's Answer to Lakeview Loan Servicing's Motion for Relief from the Automatic Stay to be served  
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at [dehartstaff@ramapo.com](mailto:dehartstaff@ramapo.com)

James Warmbrodt, Esq. at [Jwarmbrodt@kmlawgroup.com](mailto:Jwarmbrodt@kmlawgroup.com)

Dated: May 31, 2018

/s/Tullio DeLuca  
Tullio DeLuca, Esquire